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Ryan E. Cronin, Esq.  
*Counsel to Defendants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

\_\_\_\_\_  
In re

BERNARD L. MADOFF,

Debtor.

\_\_\_\_\_  
IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

**STIPULATION AND ORDER**

THE ARTICLE FOURTH NON-EXEMPT TRUST  
CREATED UNDER THE LEO M. KLEIN TRUST  
DATED JUNE 14, 1989 AS AMENDED AND  
RESTATE<sup>d</sup>, Florida trust, THE LEO M. KLEIN  
REVOCABLE TRUST DATED JUNE 14, 1989 AS  
AMENDED AND RESTATE<sup>d</sup>, a Florida trust, GLORIA  
C. KLEIN REVOCABLE TRUST DATED APRIL 16,  
1990, AS AMENDED, Florida trust, ESTATE OF LEO  
M. KLEIN, ESTATE OF GLORIA C. KLEIN, GLORIA  
C. KLEIN TRUST F/B/O JANE KLEIN, a Florida Trust,  
JANE A. KLEIN, as trustee, personal representative, and  
as an individual, GLORIA C. KLEIN TRUST F/B/O  
DEBORAH KLEIN PATTON, a Florida trust,  
DEBORAH KLEIN PATTON, as trustee and as an  
individual and JUSTIN ANDREW KLEIN,

Defendants.

Adv. Pro. No. 10-04513 (SMB)

**WHEREAS**, Andrew B. Eckstein, Philippe E. Salomon and Anthony A. Mingione of Blank Rome LLP have represented Defendants, THE ARTICLE FOURTH NON-EXEMPT TRUST CREATED UNDER THE LEO M. KLEIN TRUST DATED JUNE 14, 1989 AS AMENDED AND RESTATED, Florida trust, THE LEO M. KLEIN REVOCABLE TRUST DATED JUNE 14, 1989 AS AMENDED AND RESTATED, a Florida trust, GLORIA C. KLEIN REVOCABLE TRUST DATED APRIL 16, 1990, AS AMENDED, Florida trust, ESTATE OF LEO M. KLEIN, ESTATE OF GLORIA C. KLEIN, GLORIA C. KLEIN TRUST F/B/O JANE KLEIN, a Florida Trust, JANE A. KLEIN, as trustee, personal representative, and as an individual, GLORIA C. KLEIN TRUST F/B/O DEBORAH KLEIN PATTON, a Florida trust (together, "Defendants"), in these proceedings; and

**WHEREAS**, Defendants in these proceedings now wish to have Ryan E. Cronin, Esq. of Jaspan Schlesinger LLP represent them;

**IT IS HEREBY STIPULATED AND CONSENTED THAT** pursuant to Local Bankruptcy Rule 2090-1(e), and for good cause as demonstrated herein, the law firm of Blank Rome LLP withdraws as counsel for Defendants and the law firm of Jaspan Schlesinger LLP be and hereby is substituted as attorneys of record for Defendants in the above action.

Dated: December 5, 2014

Dated: December 29, 2014

BLANK ROME LLP  
*Withdrawing Counsel for Defendants*

JASPAN SCHLESINGER LLP  
*Substituting Counsel for Defendants*

By: /s/Anthony A. Mingione  
Andrew B. Eckstein  
Philippe E. Salomon  
Anthony A. Mingione  
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By: /s/Ryan E. Cronin  
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**SO ORDERED: February 13, 2015**

/s/Stuart M. Bernstein  
U.S. Bankruptcy Court  
Honorable \_\_\_\_\_